

UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO

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In re:
**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,**
as representative of
THE COMMONWEALTH OF PUERTO RICO,
et al.,
Debtors.¹

**PROMESA
Title III
No. 17 BK 3283-LTS
Re: ECF No. 663, 674, 858
(Jointly Administered)**

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In re:
**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,**
as representative of
**PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY (“HTA”)**
Debtor.

**PROMESA
Title III
No. 17 BK 3567-LTS
This Motion relates only to HTA
and shall be filed in the lead
Case No. 17 BK 3283-LTS and
Case No. 17 BK 3567-LTS.**

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**MOTION SUBMITTING CERTIFIED TRANSLATIONS OF
EXHIBITS TO THE MOTION REQUESTING RELIEF FROM STAY
(DCKT. 663)**

TO THE HONORABLE COURT:

COME NOW, the Managerial Employees of the Puerto Rico Highway and Transportation Authority (“HTA”) listed in Exhibit I of the Motion Requesting Relief From Stay (Dckt. 663) (the “Motion”), hereinafter designated as the “Movants” and very respectfully state and pray:

1. On July 19, 2017, the appearing parties filed the Motion (Dckt. 663). Attached to this filing the Plaintiff filed Exhibits II A, B, C and D in the Spanish language. See Dockets 663-2, 663-3, 663-4 & 663-5.
2. On the same date, the Movants filed a motion for leave to file said Exhibits in the Spanish Language. (Dckt. 664). In this Motion, the Movants requested a period until August 19, 2017 to file the certified translations of the Exhibits described above.
3. On July 19, 2019, this Honorable Court entered Order granting the leave to file the documents in Spanish. In the same Order the Court granted the Movants until August 9, 2017 to file the translated exhibits. The translations were not ready to be filed by that date.

¹The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

4. The undersigned apologizes for the delay in filing the certified translations of the exhibits to the Motion caused by the fact that the translator did not conclude the translations until last Friday, August 11, 2017.

5. Attached herewith the certified translations of the documents identified as Exhibits II, A, B, C & D (Dockets 663-2, 663-3, 663-4 & 663-5) of the Motion with the request these documents be admitted although the same have been filed after the expiration of the deadline set by this Honorable Court.

WHEREFORE, Movants respectfully request that this Honorable Court takes notice of the above, accepts our apologies for the brief delay in the filing of the certified translations of the Exhibits filed with the Motion as previously set forth and order the replacement of the Exhibits filed in the Spanish Language (in Dckt. 663) with the ones submitted herein.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 14th day of August, 2017.

I HEREBY CERTIFY that the foregoing motion was filed with the clerk of the US District Court for the District of Puerto Rico using the CM/ECF system, which automatically serves notification of the filing to all counsel of record and by other means (regular mail and/or e-mail) to counsel for HTA in various of the proceedings that have been stayed pursuant to the commencement of HTA's Title III case, including: Lcdo. Juan M. Maldonado De Jesús, Oficina del Asesor Legal ACT, P.O. Box 42007 San Juan, Puerto Rico 00940-2007 and jumaldonado@dtop.pr.gov; Carlos J. Garcia Bonilla, Oficina de Asesoría Legal ACT, PO Box 42007 San Juan, Puerto Rico 00940-2007 and cjgarcia@dtop.pr.gov; María Elena Vázquez Graziani and Rocío Ramos Santiago, Vázquez Graziani & Rodríguez, 33 Calle Resolución, Suite 805 San Juan, Puerto Rico 00920-2707 and rocioramos@vgrlaw.com and vazgra@vgrlaw.com, respectively; Sarah G. Sáez López and Raúl Castellanos, Development & Construction Law Group LLC PMB 443, Suite 112, 100 Grand Paseos Boulevard San Juan, Puerto Rico 00926 and rcastellanos@devconlaw.com and ssaez@devconlaw.com, respectively.

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